

North American Wetlands Conservation Fund

Appropriations Language

For expenses necessary to carry out the provisions of the North American Wetlands Conservation Act, Public Law 101-233, as amended, \$49,560,000, to be derived from the Land and Water Conservation Fund, to remain available until expended and to be for conservation spending category activities.

Authorizing Statutes

North American Wetlands Conservation Act of 1989 (16 U.S.C. 4401). Section 4406 of the Act (NAWCA) authorizes fines, penalties, and forfeitures from violations of the Migratory Bird Treaty Act to be made available for wetlands conservation projects. Section 4407 authorizes interest on excise taxes for hunting equipment deposited for wetlands conservation grants and costs for administering this grant program. The Act authorizes appropriations to be used to encourage partnerships among public agencies and other interests to protect, enhance, restore, and manage wetland ecosystems and other habitats for migratory birds and other fish and wildlife; to maintain current or improved distributions of migratory bird populations; and to sustain an abundance of waterfowl and other migratory birds consistent with goals of the North American Waterfowl Management Plan and international obligations with other countries. The Act authorizes annual appropriations not to exceed \$55 million in FY 2003, \$60 million in FY 2004, and increasing annually by \$5 million until reaching an amount not to exceed \$75 million in FY 2007. The allocation of funds available for projects in Canada and Mexico is “at least 30 per cent and not more than 60 per cent” and the allocation of funds available for projects in the United States is “at least 40 percent and not more than 70 percent.” *Coastal Wetlands Planning, Protection and Restoration Act* funds are available only for U.S. projects.

Coastal Wetlands Planning, Protection and Restoration Act (16 U.S.C. 3951-3956). Establishes the National Coastal Wetlands Planning, Protection and Restoration Program within the Sport Fish Restoration Account for projects authorized by NAWCA in coastal states. Authorization of Appropriations expires September 30, 2009.

Aquatic Resources Trust Fund (26 U.S.C. 9504). Authorizes appropriations from the Sport Fish Restoration Account to carry out the *Coastal Wetlands Planning, Protection and Restoration Act*.

Other Authorizations

Appropriations Act of August 31, 1951 (P.L. 82-136, 65 Stat. 261)

Federal Aid in Wildlife Restoration Act of 1937, as amended (16 U.S.C. 669-669i)

Migratory Bird Conservation Act, as amended (16 U.S.C. 715)

Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. 703-712)

Nonindigenous Aquatic Nuisance Prevention and Control Act, as amended (16 U.S.C. 4701 et seq.)

Federal Aid in Fish Restoration Act, as amended (16 U.S.C. 777-777k)

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North American Wetlands Conservation Fund	2002 Actual	2003 Estimate	Uncontrollable & Related Changes (+/-)	Program Changes (+/-)	2004 Budget Request	Change From 2003 (+/-)
Appropriations:						
Wetlands Conservation \$(000)	41,760	41,818	0	+5,760	47,578	+5,760
Administration \$(000)	1,740	1,742	0	+240	1,982	+240
CAM	[313]	[TBD]	0	0	[TBD]	0
FTE	12	11	0	0	11	0
Subtotal, \$(000) Appropriations	43,500	43,560	0	+6,000	49,560	+6,000
Receipts:						
Migratory Bird Treaty \$(000)	518	526	0	-26	500	-26
Total, North American Wetlands Conservation Fund \$(000)	44,018	44,086	0	+5,974	50,060	+5,974
FTE	12	11	0	0	11	0
North American Wetlands Conservation Fund Receipts from Other Accounts						
Receipts:						
Wetlands Conservation (in Federal Aid in Wildlife Restoration Account) \$(000)	[14,116]	[12,480]	[-]	[-]	[12,480]	[-]
Administration \$(000)	[588]	[520]	[-]	[-]	[520]	[-]
FTE	[10]	[10]	[-]	[-]	[10]	[-]
Subtotal, Federal Aid in Wildlife Restoration Account \$(000)	[14,704]	[13,000]	[-]	[-]	[13,000]	[-]
FTE	[10]	[10]	[-]	[-]	[10]	[-]
Coastal Wetlands Conservation (in Sport Fish Restoration Account) \$(000)	[13,040]	[12,201]	[-]	[+202]	[12,403]	[+202]
FTE	[2]	[2]	[-]	[-]	[2]	[-]

2004 Program Overview

The NAWCA grant program is an internationally-recognized program that provides grants throughout the U.S., Canada, and Mexico and serves as one of the key conservation instruments for waterfowl and other migratory birds. For over 12 years, the NAWCA grant program, through voluntary grant partnerships, has both protected and improved the health and integrity of the landscapes in which people reside and work in harmony with our fish and wildlife resources. To date, the Service together with over 2,000 partners has advanced 1,115 projects in 50 states, the U.S. Virgin Islands, 13 Canadian provinces and 24 Mexican states.

Country	Protected Acres	Enhanced, Restored, and Created Acres	Number of Projects
Canada	4,062,440	2,556,547	361
Mexico	19,372	480,610	141
U.S.	1,867,436	1,932,498	613
All Countries	5,949,248	4,969,655	1,115

Acres represent total proposed acres approved for funding, to date, including the first round of FY 2003 grants. Some acres are included in both "Protected" and "Enhanced, Restored and Created" due to multiple activities occurring on the same property. Therefore, while the two categories should not be added to demonstrate total acres affected, it can be said that approximately 8.8 million acres have been affected by protection, enhancement, or restoration activities. Table compiled January 2003.

The NAWCA program, which is implemented on both public and private lands, continues to support the Secretary's 4C's vision -- Communication, Consultation, and Coordination in support of Conservation. NAWCA matching grants are awarded to a variety of private landowners, states, non-governmental conservation organizations, tribes, federal agencies, trusts, and corporations.

The Service is in the process of developing a new operational performance plan that directly aligns all program activities and objectives with the Secretary's four strategic plan mission components - Resource Protection, Resource Use, Recreation, and Serving Communities. The Service's operational plan will contain new long-term and annual performance goals and measures to guide the delivery of program implementation, management reform, and budget formulation. The alignment and integration of program performance with budget formulation will provide the context for transparent accountability and the foundation for continual improvement. The Service anticipates completion of a new operational plan by fall of 2003.

The program supports the DOI draft Strategic Goal of Resource Protection. Through voluntary habitat restoration projects, this program furthers the DOI End Outcome Goals to sustain biological communities.

NAWCA grants support the goals of the North American Waterfowl Management Plan (NAWMP), signed by the U.S., Canada and Mexico, which responds to the loss of wetland habitats essential to the survival of waterfowl populations and other migratory bird species. In addition to the North American Waterfowl Management Plan, NAWCA is widely recognized for advancing many other bird conservation initiatives such as Partners in Flight, North American Bird Conservation Initiative, U.S. Shorebird Plan, and North American Waterbird Conservation Plan.

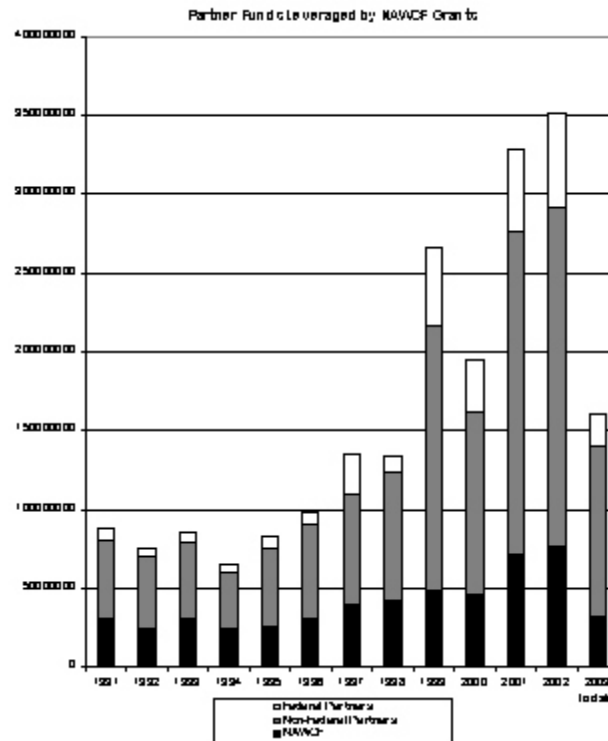
NAWCA grants act as catalysts in bringing partnerships together to support wetland projects and leverage non-federal funding. These grants successfully:

- Generate average partner contributions 2-3 times in excess of federal NAWCA dollars invested,

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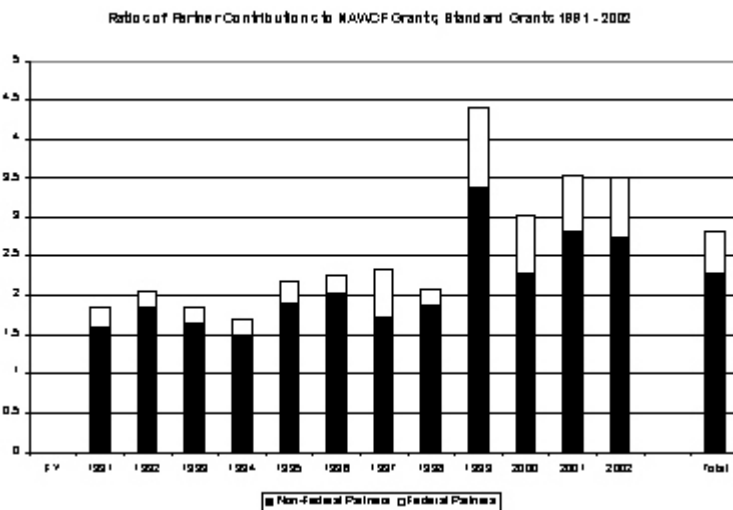
- Foster public and private sector cooperation for migratory bird conservation, flood control, erosion control, and water quality conditions,
- Sustain cultural traditions,
- Provide a major source of funds to implement the tri-national North American Waterfowl Management Plan and other national and international bird conservation plans, and
- Assist in the recovery of endangered and threatened species.

NAWCA administers both a standard and small grants program. Standard grants can be awarded in the U.S., Canada, and Mexico, for amounts generally ranging from \$50,000 to \$1,000,000, and must generate an equivalent or greater match in partner funds. The small grants program is available only in the U.S., and is designed to assist partners with only modest matching funds compete and participate in NAWCA, thus expanding the potential universe of partners and diversity of projects. The top limit for a small grant is \$50,000.



From FY 1991 through FY 2002, approximately 1,500 partners including environmental organizations, sportsmen's groups, corporations, farmers and ranchers, small businesses, federal, state and local governments, and private landowners implemented 904 projects worth over \$1.8 billion under the Act's standard grants program. NAWCA has contributed over \$479 million to support these projects, with

partner funds of \$1.36 billion resulting in a total partner/grant ratio of \$2.84 for every \$1.00 of federal grant funds. These projects have protected, restored, or enhanced more than 8.8 million acres of wetlands and associated uplands in the U.S. and Canada. In addition, millions of acres within Mexico's large biosphere reserves have benefitted from conservation actions including environmental education, management, and planning efforts.

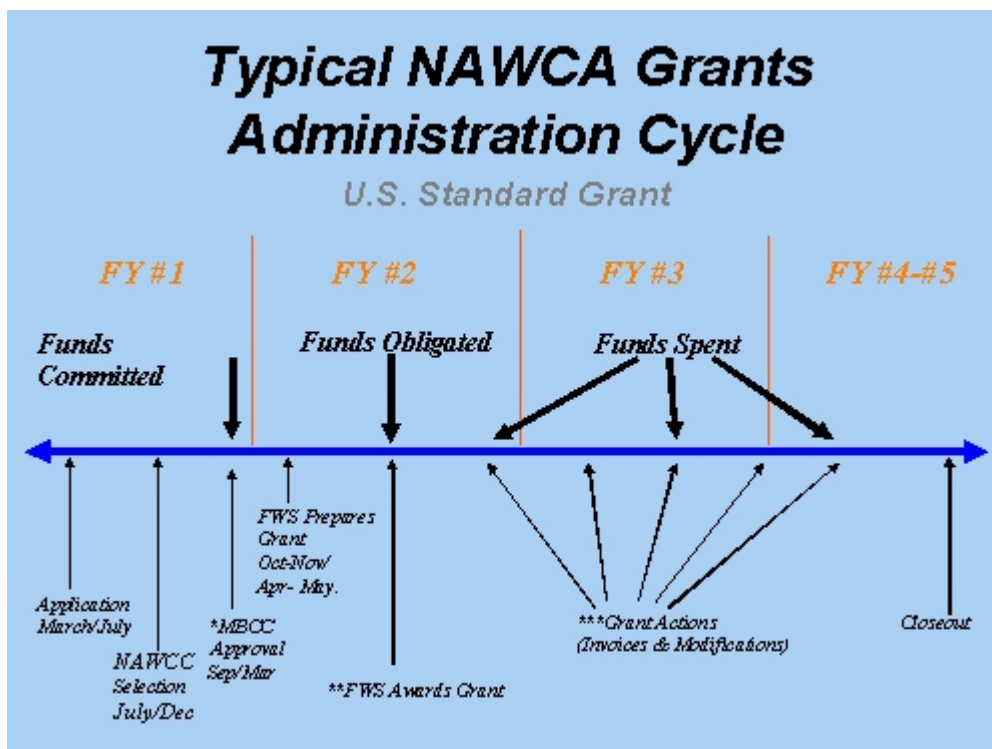
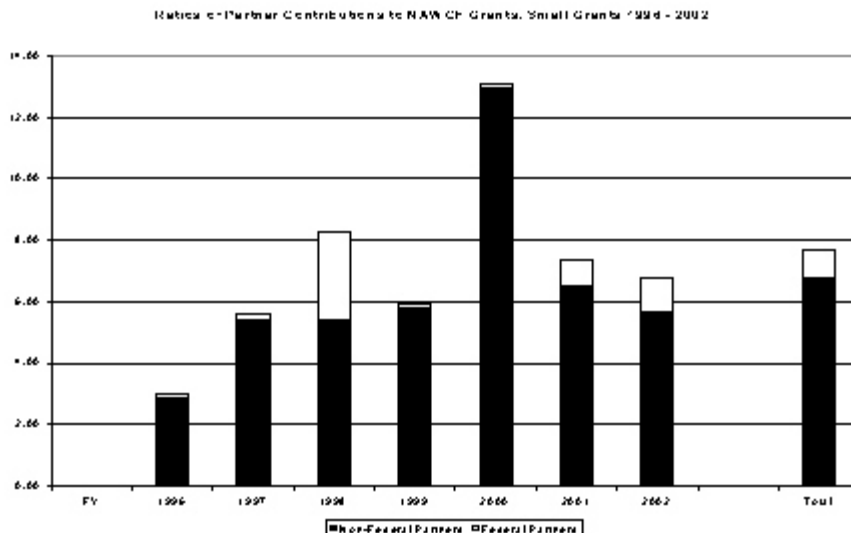


In the U.S., the small grants program started in 1996 with \$250,000. Currently up to \$2 million of NAWCA funds may be used for

small grant awards each year, depending upon the availability of qualifying projects. To date, working with over 450 partners, 160 submitted projects have received a total of about \$6.6 million with partners

contributing more than \$50.5 million. Small grants leverage nearly eight match dollars for every federal grant dollar. Small grant projects have been funded in 42 states, benefitting an extremely diverse assortment of wetland and wetland-associated upland projects.

A nine-member North American Wetlands Conservation Council recommends projects for final approval by the Migratory Bird Conservation Commission (MBCC). The Council is composed of the Service Director, Secretary of the Board of the National Fish and Wildlife Foundation, Directors of State Fish and Game Agencies representing each of the four migratory bird flyways, and representatives from three nonprofit conservation organizations actively involved in wetlands conservation projects.



May not accurately represent the less complex small grants.

* 100% of NAWCA grants are approved and committed by the MBCC in the same fiscal year in which those funds are appropriated.

** Processing/obligation of grants often requires 6-8 months due to the nature of NAWCA conservation projects and FWS administrative procedures.

*** Funds are expended as requested by each grantee over the life of the grant, typically 2-3 fiscal years.

The MBCC includes the Secretaries of Interior and Agriculture, the Administrator of the Environmental Protection Agency, two U.S. Senators and two U.S. Representatives. The MBCC approves, rejects, or reorders the priority of any Council-recommended project.

The Act authorizes funding from four sources:

- Direct appropriations
- Interest from receipts in the Federal Aid in Wildlife Restoration account
- Fines, penalties and forfeitures resulting from violations of the *Migratory Bird Treaty Act*, and
- Receipts from the Sport Fish Restoration account for U.S. coastal projects (Pacific and Atlantic coastal states, states bordering the Great Lakes, Puerto Rico, the Virgin Islands, Guam, the Commonwealth of the Northern Mariana Islands, and American Samoa).

Section 8.(a)(1) of the Act, as amended, authorized the Secretary to use up to four percent of appropriated, interest, fine and coastal funding available in a given year for administering the wetlands conservation program. To more efficiently administer the program as well as increase the level of customer service, the Service is implementing enhancements such as incorporating electronic payment systems, assuming programmatic responsibility for grant awards and moving toward electronic grants. All information technology system enhancements are coordinated with the larger DOI effort to implement IT reforms.

2002 Program Performance Accomplishments

In FY 2002, approved NAWCA project proposals are supporting over 140 partnership-driven wetlands conservation projects. Over 590 partners are participating in these projects which when completed will protect over 1,000,000 acres and restore, enhance, or create over 500,000 acres of habitat. Some examples of these initiatives include:

Poso Creek Flood Plain Wetland Habitat Project, California – Twenty-three partners contributed over \$6.5 million to the \$1 million NAWCA grant they received to protect, restore, and/or enhance 9,306 acres of declining wetland habitat and associated uplands within the Tulare Basin. Their efforts will directly benefit migratory birds and other wildlife, including 18 species of priority bird species, 17 federal and state endangered or threatened species of wildlife, and 34 wildlife species of special concern.

Chenier Plain Coastal Wetlands Restoration Project, Louisiana – A diverse public-private partnership received a \$999,364 NAWCA grant to restore and enhance 29,237 acres of wetland habitat within the coastal marshes of the Mermentau River Basin. The partnership contributed an additional \$2,156,303 to the project, and in total affected over 58,400 acres of coastal wetland benefitting more than 60 species of high priority and priority migratory waterfowl and other wetland-associated bird species.

Connecticut River - Northern Valley Conservation Project, New Hampshire and Vermont – A diverse partnership received a \$955,000 NAWCA grant which was matched with \$13,757,000 to protect 82,829 acres of habitat along 80 miles of the Connecticut River. This corridor is crucial for migratory waterfowl, grassland, and shorebird species and contains the largest remaining population of the federally-endangered dwarf wedge mussel.

2003 Performance Goal Estimates

In FY 2003 the NAWCA is expected to fund over 100 projects that will protect, enhance or restore over 750,000 acres. Approximately 44 project proposals together with over 260 diverse partners have already been approved. When completed, these approved projects will protect over 230,000 acres and enhance, restore, or create about 190,000 acres of habitat for migratory birds and other wildlife. Planned projects include:

The Chesapeake Bay Initiative Project, Phase III, in Pennsylvania, Delaware, Maryland, Virginia, and West Virginia -- In this third phase, eight partners will restore 5,000 wetland acres, 3,300 upland acres, and 9,100 riparian acres (740 miles) with the \$1 million NAWCA grant they received. Partners are contributing \$2,006,410 to the project, which will benefit endangered/threatened avian and aquatic species, fish and shellfish populations, and water quality.

Connecticut Lakes Headwaters Project, New Hampshire -- A large, diverse partnership is adding \$41,040,000 to the \$1 million NAWCA grant it received to perpetually protect 171,500 contiguous acres of wetland complexes, 841 miles of streams and brooks, and unfragmented tracts of forest. This project will benefit one-fourth of the state's threatened and endangered species, numerous migratory waterfowl and songbird species, 50 rare plant species, and a diversity of other wildlife species.

Southern Tallgrass Prairie Wetlands Initiative Project, Iowa and Minnesota -- A total of 46 partners have joined together to support the permanent protection and restoration of 1,466 acres of wetland and grassland habitats within the prairie pothole ecosystem. Partners received a \$1 million NAWCA grant, to which they are adding \$1,430,192 to further their goals and ensure benefits to a diversity of wildlife species, particularly migratory waterfowl, grassland, and shorebird species.

Justification of 2004 Program Changes

Subactivity		2004 Budget Request	Program Changes (+/-)
Wetland Conservation	\$(000)	47,578	+5,760
Administration	\$(000)	1,982	+240
Total	\$(000)	49,560	+6,000
	FTE	11	0



Chesapeake Bay, Phase III - Begun in 1996, objectives included restoration of wetland hydrology to prior-converted wetlands, farmed wetlands/pastures and degraded tidal wetlands. Further restoration work will eliminate exotic plant species, plant native grasses and provide water control devices.

The FY 2004 budget request for the NAWCA program is \$50,060,000 (including an estimated \$500,000 collected from *Migratory Bird Treaty Act* fines) and 11 FTE, a net program increase of \$6,000,000 to the 2003 President's budget request level. Other resources available for accomplishing the major performance goals supported by these appropriated funds include carryover funds from previous appropriations ([\$7,713,000] in 2004), partner matching funds from grant commitments([\$274 million] in 2002) and funds from permanent appropriations ([\$517,635] in 2002).

The Service is requesting an additional \$6,000,000 to provide additional funds, and to leverage greater partner support, for

the restoration and conservation of important migratory bird habitats. The requested increase combined with the full appropriation plus other dedicated funds are expected to be matched with at least \$314 million of partner's funds. This aggregate funding will support projects that contribute not only to conservation, but to local economies through jobs and migratory bird-related recreation. This increase will also enable the Service to expand international commitments for migratory bird conservation in the United States, Mexico, and Canada. As a result of the requested increase, the Service expects to protect and restore at least 862,000 acres of valuable migratory bird habitat across Canada, Mexico, and the United States thereby creating additional habitat conditions for biological communities to flourish (DOI Strategic Goal: Resource Protection).

The demand for program support is indicated by the high number of eligible project proposals the Service is unable to fund. From FY 1991 through FY 2002, 618 project proposals in all three countries worth approximately \$615 million (including over \$153 million in NAWCA fund requests and over \$461 million in partner support) that would have affected about 1.1 million acres were unfunded. Between FY 1991 and FY 2002, 49 percent of eligible U.S.-only projects did not receive funding. Partners in these unfunded projects were prepared to commit over \$454 million, representing over 1.0 million acres of unprotected habitat. In FY 2002 alone, the Service was unable to award grants for 71 projects in all three countries (52 in the U.S.). These projects would have leveraged over \$55 million in partner support.

The NAWCA program has supported over 2,000 partners who voluntarily restored fish and wildlife habitat on their lands, lands that emphasize critical habitats for migratory birds. Through this program NAWCA partners have increased habitat benefits to fish and wildlife populations on over 8.8 million acres of land across the U.S., Canada, and Mexico. The program continues to be well-received by a diverse set of partners, and has accomplished significant on-the-ground habitat restoration in wetland ecosystems, including working landscapes (agricultural and silvicultural lands).

In addition to providing financial support to private and public partners, the \$6 million increase will further the Service's success in conserving and assisting with fulfilling the population and habitat objectives of existing bird conservation plans such as the North American Waterfowl Management Plan, Partners in Flight, the North American Waterbird Conservation Plan, U.S. Shorebird Plan, and the priorities of the North American Bird Conservation Initiative. Through NAWCA, the Service will be able to leverage approximately \$24 million with the \$6 million increase to protect, restore, and enhance an additional 62,300 acres of wetland, upland, and riparian habitat. This work will be accomplished through an additional nine to ten, grant supported, voluntary stewardship partnerships.

Relationship to Performance Goals:

This subactivity supports DOI's Resource Protection Mission – Outcome Goal 2, which is aimed at sustaining biological communities on DOI managed and influenced lands and waters (Strategy 1 - Create habitat conditions for biological communities to flourish).

Program Performance Summary

FY 2002 - 2004 Program Accomplishments on Approved Grants for Partners*			
Fiscal Year	2002 Grant Commitments	2003 (Estimated)	2004 (Estimated)
Appropriations	\$43.50 million	\$43.56 million	\$49.56 million
Total Federal Funding Level **	\$71.8 million	\$69.3 million	\$75.5 million
Partner Contribution	\$274 million	\$276 million	\$314 million

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Ratio of NAWCF to Partner \$\$	1: 3.8	1: 4.0	1: 4.2
Acres To Be Protected, Enhanced or Restored***	908,000	758,000	862,000
No. Projects	143	107	121

- * Presents data for FY 2002 & 2003 on grants approved by Migratory Bird Conservation Commission providing an indication of partnership accomplishments; individual grant performance takes 2-4 years to implement; FY 2004 estimate proportionally derived from FY 2003 estimate.
- ** Includes NAWCA appropriations, Federal Aid in Wildlife Restoration interest, Sport Fish Restoration funds, and *Migratory Bird Treaty Act* fines (96 percent of funds are available for grants and 4 percent of funds are available for administration).
- *** Data reflects acres committed to be protected/restored through grant agreements using that fiscal year funds; comparisons of this table with the Program Performance Summary table below is inappropriate since the latter table presents "actual" performance data derived from completed grant projects that reflect funding from several preceding fiscal years (projects take 2-4 years to implement and complete); acres are not proportionally constant due to voluntary nature of partner proposals, which vary year-to-year.

DOI Strategic Goal: <u>Resource Protection</u> -Sustain Biological Communities on DOI Managed and Influenced Lands and Waters in a Manner Consistent with Obligations Regarding the Allocation and Use of Water						
End Outcome Measure: Percent of species of management concern that are managed to self-sustaining levels, in cooperation with affected States and others, as defined in approved management plans. <i>(At this time this program is not contributing to this end outcome measure. The program is using this measure as a link to the Draft DOI Strategic Plan).</i>						
Intermediate Outcome: <i>Create habitat conditions for biological communities to flourish</i>						
Intermediate Outcome Measures/ Performance Measures *	2001 Actual	2002 Plan	2002 Actual	2003 Plan	2004 Plan	Change (2003 Plan to 2004 Plan)
Habitat Protection: Acres and stream shoreline miles protected for habitat as specified in management plans and program objectives and consistent with applicable substantive and procedural requirements of State and Federal Water Law.	464,872 [128,096] [336,776] [167]	320,133 [104,973] [215,160] [61]	420,965 [110,840] [310,125] [116]	713,668 [312,655] [401,013] [0]	643,282 [278,812] [364,470] [0]	-70,386 [-33,843] [-36,543] [0]
Habitat Restoration: Acres restored as specified in management plans [Wetland Acres] [Upland Acres] [Riparian Miles]	499,157 [215,601] [283,556] [950]	397,527 [207,860] [189,667] [2,547]	347,570 [167,318] [180,253] [3,442]	727,925 [411,449] [316,476] [25]	764,025 [303,200] [460,825] [1]	+36,100 [-108,249] [+144,349] [-24]

- * Performance data derived from grant agreement accomplishments that include funds from multiple fiscal years. Comparisons of this table with the preceding FY 2002-2004 Accomplishments on Approved Grants for Partners table is inappropriate since the former table presents data on acres committed to be implemented over a 2-4 year period through approved grants, or estimates that are based on approved grants.

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Standard Form 300

**DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
NORTH AMERICAN WETLANDS CONSERVATION FUND**

Program and Financing (in thousands of dollars)			
Identification code 14-5241-0-2-303	2002 Actual	2003 Estimate	2004 Estimate
<u>Unavailable Collections:</u>			
01.99 Balance, start of year	0	0	0
<u>Receipts:</u>			
02.01 Fines, penalties, and forfeitures from Migratory Bird Treaty Act	518	526	500
<u>Appropriations:</u>			
05.01 North American Wetlands Conservation Fund (-)	-518	-526	-500
07.99 Balance, end of year	0	0	0
<u>Obligations by Program Activity:</u>			
Direct program:			
00.01 Wetlands conservation projects - Title I	13,077		
00.02 Administration - Title I	1,336		
00.03 Wetlands conservation projects - Title 1 LWCF		67,102	48,287
00.04 Administration - Title I LWCF		1,742	1,982
00.05 Wetlands conservation projects - Title VIII LWCF	3,276	216	107
00.06 Administration - Title VIII LWCF	270	354	175
10.00 Total obligations	17,959	69,414	50,551
<u>Budgetary Resources Available for Obligation:</u>			
21.40 Unobligated balance available, start of year	5,679	33,041	7,713
22.00 New budget authority (gross)	44,018	44,086	50,060
22.10 Resources available from recoveries of prior year obligations	1,303		
23.90 Total budgetary resources available for obligation	51,000	77,127	57,773
23.95 Total new obligations	-17,959	-69,414	-50,551
24.40 Unobligated balance carried forward, end of year	33,041	7,713	7,222
<u>New Budget Authority (gross), detail:</u>			
Current:			
43.00 Appropriation (total discretionary)	43,500	43,560	49,560
Permanent:			
60.20 Special fund (indefinite)	518	526	500
70.00 Total new budget authority (gross)	44,018	44,086	50,060

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Change in Unpaid Obligations:			
72.40 Obligated balance, start of year	57,971	39,692	65,041
73.10 Total new obligations	17,959	69,414	50,551
73.20 Total outlays, gross (-)	-34,935	-44,066	-48,268
73.45 Recoveries of prior year obligations	-1,303		
74.40 Obligated balance, end of year	39,692	65,041	67,324

Outlays, (gross) detail:			
86.90 Outlays from new discretionary authority	30,450	30,492	34,692
86.93 Outlays from discretionary balances	4,182	13,050	13,068
86.97 Outlays from new mandatory authority	263	368	350
86.98 Outlays from mandatory balances	40	155	158
87.00 Total outlays (gross)	34,935	44,066	48,268

Net Budget Authority and Outlays:			
89.00 Budget authority	44,018	44,086	50,060
90.00 Outlays	34,935	44,066	48,268

Object Classification (in thousands of dollars)			
Identification code 14-5241-0-2-303	2002 Actual	2003 Estimate	2004 Estimate
11.1 Full-time permanent	826	794	832
11.3 Other than full-time permanent	21	20	21
11.5 Other personnel compensation	10	10	10
11.9 Total personnel compensation	857	824	863
12.1 Civilian personnel benefits	202	194	204
13.0 Benefits for former personnel	3	3	3
21.0 Travel and transportation of people	75	76	77
22.0 Transportation of things	1	1	1
23.3 Communications, utilities, and miscellaneous charges	5	5	5
24.0 Printing and reproduction	24	24	25
25.2 Other services	188	191	194
25.3 Purchase of goods and services from Government accounts	397	404	410
25.7 Operation and maintenance of equipment	51	52	53

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26.0 Supplies and materials	16	16	17
31.0 Equipment	179	182	185
32.0 Land and structures	905	921	935
41.0 Grants, subsidies, and contributions	15,056	66,522	47,579
99.9 Total obligations	17,959	69,414	50,551

Personnel Summary			
Identification code 14-5241-0-2-303	2002 Actual	2003 Estimate	2004 Estimate
<u>Direct:</u>			
Total compensable workyears:			
1001 Full-time equivalent employment	12	11	11
Average salary per FTE	71,417	74,916	78,421